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December 28, 2015

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Tom Mahler

**SUBJECT: Framework for an Incident Management Plan
West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Mr. Mahler,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., and Rock Road Industries, Inc., (the Operable Unit -1 or OU-1 Respondents) and the United States Department of Energy (the Federal Respondents), Engineering Management Support Inc. (EMSI) submits the attached Framework for development of an Incident Management Plan for OU-1 as required by paragraph 34b of the December 9, 2015 Unilateral Administrative Order for Removal Action at the West Lake Landfill Superfund Site , EPA Docket No. CERCLA-07-2016-002. If you have any questions or desire additional information related to this submittal or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.

A handwritten signature in black ink, appearing to read 'Paul V. Rosasco', with a stylized flourish at the end.

Paul V. Rosasco, P.E.

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FRAMEWORK FOR AN OU-1 INCIDENT MANAGEMENT PLAN

1. INTRODUCTION

In accordance with Paragraph 34(b) of the UAO (defined below), this document presents a framework and proposed schedule for development of an Incident Management Plan (IMP) for the West Lake Landfill Superfund Site (the site). The site has been divided by the Environmental Protection Agency (EPA) into two operable units. Operable Unit-1 (OU-1) consists of two areas/disposal units at the site where radiologically-impacted materials (RIM) have been identified in soil material intermixed with and interspersed within the overall matrix of solid wastes. These two areas have been designated Radiological Areas 1 and 2, or, more simply, Areas 1 and 2 (Figure 1). The other portions of the site comprise Operable Unit-2 (OU-2).

EPA and the named potentially responsible parties, Bridgeton Landfill, LLC (Bridgeton), Rock Road Industries, Inc. (Rock Road), and Cotter Corporation (N.S.L.)(Cotter) (collectively, the OU-1 Respondents), and the United States Department of Energy (DOE) (the Federal Respondent) previously entered into an Administrative Order on Consent for completion of a Remedial Investigation (RI) and Feasibility Study (FS) for OU-1. On December 9, 2015, EPA issued a Unilateral Administrative Order (UAO) to the OU-1 Respondents that requires installation of a non-combustible cover over those portions of Areas 1 and 2 where RIM is present at or near the ground surface.

The UAO also requires the OU-1 Respondents to prepare a Work Plan/Framework for development of an IMP for OU-1 Areas 1 and 2. Specifically, Section VII, Paragraph 34(b) identifies 15 elements that need to be addressed in the IMP. Section 3 of this Framework addresses these 15 requirements. An IMP for Bridgeton Landfill (Bridgeton IMP), which is considered to be part of OU-2, already exists. The Bridgeton IMP was created with input from, and in coordination with, various first responders and regulatory agencies. The OU-1 Respondents propose to use the existing Bridgeton IMP, with appropriate modifications to address the OU-1 specific requirements and actions, to also serve as the IMP for OU-1. Therefore, Section 2 of this Framework presents a brief description of the existing Bridgeton Landfill IMP, a copy of which is included as an attachment to this framework. Section 4 of this document presents an anticipated schedule for development and submission of a draft IMP to EPA.

2. BRIDGETON LANDFILL IMP

Bridgeton coordinated with appropriate regulatory authorities and local first responders to develop an IMP for the Bridgeton Landfill (the “existing IMP” or the “Bridgeton Landfill IMP”) that has been designed to meet the requirements of 40 CFR Part 265, Subpart D – Contingency Plan and Emergency Procedures. The operative goal of the existing Bridgeton IMP is to prevent incidents and to describe required protocols for initial incident emergency calls, coordination of responses, and resumption of normal activities in the case of interruption. The existing

Bridgeton IMP (last revised June 30, 2015) identified potential incidents that may occur as a result of landfill activities, including but not limited to:

- Placement and maintenance of cover materials;
- Collection, management, and destruction of landfill decomposition gas;
- Generation, storage, and treatment of leachate;
- Collection and disposal of landfill leachate;
- Operation of a waste transfer station, at which waste is transferred from small local collection trucks into large long-haul trucks for transportation to a remote landfill; and
- Management of a recognized heat-generating event (subsurface reaction or subsurface smoldering event or SSE) that is occurring within the South Quarry solid waste disposal area.

The potential incidents identified in the existing Bridgeton IMP at the Bridgeton Landfill fall into one of the following categories:

- Surface Fire;
- Personal Injury – Man Down / Personnel Contamination;
- Sudden Waste Movement; and
- Leachate Release.

3. OU-1 IMP FRAMEWORK

OU-1 Areas 1 and 2 are completely enclosed by a separate fence that also contains signage indicating that these areas contain radiological materials. These areas are listed as a restricted access area in the existing Bridgeton IMP. All activities conducted in Areas 1 and 2 are performed in accordance with an approved, project-specific Health and Safety Plan and associated Radiation Safety Plan.

In accordance with the UAO, the OU-1 Respondents will evaluate potential incidents that could occur in OU-1, and will develop incident management measures to address these scenarios. The OU-1 Respondents propose to modify the existing IMP for Bridgeton Landfill to incorporate any additional requirements related to OU-1 instead of creating a second, separate plan specific to OU-1. Use of a single overall plan for these two adjacent sites will obviate the need for determining which plan governs in the event of an incident.

The OU-1 Respondents expect that the modifications to the existing Bridgeton IMP to describe monitoring for and responses to potential incidents that may occur in OU-1 Areas 1 and 2 will be developed in an iterative and interactive manner in conjunction with discussion with and input from first responders, local health department personnel, the Missouri Department of Natural Resources (MDNR), and EPA.

The 15 required elements of the OU-1 IMP, as set forth in Paragraph 34(b) of the UAO, are addressed below.

1. Description of a surveillance system that will provide continuous 24-hour observations of activities at OU-1.

Although Bridgeton currently has continuous, controlled access and 24/7 routine inspection and monitoring program in place, descriptions of these programs are not currently included in the existing Bridgeton IMP. The OU-1 Respondents will update the existing Bridgeton IMP to include a description of access control measures as well as a description of the routine inspection and monitoring program that is already implemented at the site. In addition, the OU-1 Respondents will identify any additional measures necessary to control access and include inspection and monitoring of OU-1 Areas 1 and 2 as part of the current monitoring program. Specifically, the OU-1 Respondents will identify supplemental inspection/vantage points located outside of Areas 1 and 2 that will be used as part of the existing, ongoing Bridgeton Landfill inspection program to overlook and inspect Areas 1 and 2. It is anticipated that at a minimum, inspection of Area 1 will be performed from along the site access road located on the south side of Area 1 and/or from the site access road located on the top of the North Quarry portion of the Bridgeton Landfill to the south of Area 1 and that inspection of Area 2 will be performed from a vantage point located on top of the inactive sanitary landfill (Figure 1). The OU-1 Respondents currently anticipate that such inspection points will be added to the existing Bridgeton Landfill inspection program on or before January 4, 2016. It is anticipated that the visual inspections of Areas 1 and 2 will be performed on a regular and continuous basis until the non-combustible cover over Areas 1 and 2 is installed and it is demonstrated that the remaining vegetation does not pose a risk of release of radionuclides, as required by the UAO. The 24-hour controlled access to OU-1 Areas 1 and 2, and oversight during all activities conducted in OU-1 Areas 1 and 2, will continue through implementation of the EPA-selected remedial actions for OU-1.

2. Description of measures to prevent incidents which could result in the release of hazardous substances, anticipated initial response actions, coordination of responses including proposed command post locations, and resumption of normal activities.

The existing Bridgeton IMP already includes sections regarding incident prevention (Section 4.0), anticipated initial response actions (Section 5.0), coordination of responses including proposed command post locations (Section 5.0), and resumption of normal activities (Section 6.0). The OU-1 Respondents propose to revise the existing Bridgeton IMP to reflect any additional measures that can be taken to prevent incidents in OU-1 that may result in the release of hazardous substances, anticipated initial response actions specific to OU-1, coordination of responses including proposed command post locations for potential incidents in OU-1, and resumption of normal activities at OU-1. Currently, office trailers and associated facilities (e.g., equipment decontamination pads, decontamination water and investigative derived waste storage units, etc.) are located at the entrances to both Areas 1 and 2. The locations of these facilities are shown on Figure 1. These facilities will be maintained to serve as potential additional command post locations in the event an incident occurs in Area 1 or 2. Use of the Area 1 and 2 command posts as possible additional command post locations (beyond those previously

identified in the existing Bridgeton IMP) for responding to an incident that may occur in Areas 1 and 2 is subject to the nature of an event as well as wind direction at the time of an event.

3. Defined responses at -OU1 for various emergency scenarios, at a minimum to include surface fires.

The existing Bridgeton IMP already includes defined responses to emergency scenarios (Section 5.0), including a surface fire. The existing Bridgeton IMP does not currently define response measures specific to areas within OU-1 as these are restricted access areas and excluded from the scope of the current plan. The OU-1 Respondents propose to revise the existing Bridgeton IMP to reflect any additional requirements (e.g., personal protective equipment, personnel screening, monitoring, etc.) that would be necessary to respond to emergency scenarios occurring in OU-1. Development of potential response measures for possible incidents that may occur in Areas 1 or 2 will require discussion and coordination with the various first responders and other regulatory agencies, where appropriate.

4. Description and contact information for personnel responsible (primary and alternate) for notifications and response elements of the plan, as well as individuals with the authority to commit resources.

The existing Bridgeton IMP already includes a description of and contact information for personnel responsible (primary and alternate) for notifications and response elements of the IMP (Section 5.0 and Table 1). The OU-1 Respondents propose to revise the existing Bridgeton IMP to identify any additional personnel (primary and alternate) that would be necessary for notifications, and with the authority to commit resources, to respond to incidents occurring in OU-1.

5. Staffing plan to ensure IMP implementation 24 hours a day, 7 days per week.

The landfill is staffed twenty-four (24) hours per day, seven (7) days per week, including holidays. During business hours, the site is staffed by technicians, specialists, managers, and third-party consultants/contractors, all of whom have received Bridgeton's site contractor training, which includes an overview of health and safety and emergency response measures. In addition, during the night shift, third-party contractors are employed to complete various tasks, including hazard identification at and around the site. Finally, both a manager and a technician are on call at all times to respond to incidents and are trained in all elements of the Bridgeton IMP. The OU-1 Respondents propose to revise the existing Bridgeton IMP to include a description of the staffing plan, to define additional roles and responsibilities, and to affirm that the revised IMP will be implemented twenty-four (24) hours per day, seven (7) days per week.

6. Identification of when and how notifications will be made (to completion) by Bridgeton Landfill personnel to local emergency responders as well as to the regulatory agencies, including EPA, MDNR, and the Missouri Department of Health and Senior Services

(MDHSS). The IMP shall include a notification checklist to be used in the event of an emergency scenario identified in number 3 above.

The existing Bridgeton IMP already includes identification of when and how notifications will be made by Bridgeton personnel to local emergency responders as well as to regulatory agencies, dependent upon the level and type of incident (Section 5.0). The OU-1 Respondents propose to revise the existing Bridgeton IMP to include additional information as necessary to address how and when notifications will be made to completion in response to an incident in OU-1 and will include additional notifications as required by the EPA. The OU-1 Respondents will also add notification checklists to be used in the event of potential emergency scenarios described in the revised IMP, as per EPA's instructions in the UAO.

7. List of equipment and other resources maintained on-Site to address the various emergency scenarios, along with readiness/personnel for deployment and how additional equipment may be obtained within specified timeframes. This shall include a map identifying storage locations for the equipment and resources identified in the plan, as well as a description of how equipment will be maintained for the duration of the IMP. In addition, the IMP shall include a map indicating ingress and egress locations for first responders, as well as initial staging locations.

The existing Bridgeton IMP already identifies resources maintained on-site to address various emergency scenarios (Figure 3), ingress and egress locations for first responders (Figures 2 and 3), and staging locations (Figure 3). The OU-1 Respondents will revise the existing Bridgeton IMP to include the list of equipment and other resources maintained on-site, readiness of personnel for deployment, and how equipment may be obtained within specified timeframes to respond to incidents in OU-1, including a map identifying storage locations for the equipment and resources identified in the plan. The OU-1 Respondents will also meet and work with the first responders and other regulatory authorities, as necessary, to determine what additional resources and access points (both ingress and egress) may be required to respond to possible incidents that may occur in Areas 1 and 2. Specifically, the OU-1 Respondents anticipate meeting with representatives of the various first responders in January 2016 and conducting a site tour, including entry into Areas 1 and 2 with the first responders, to ascertain potential access points and other possible items the first responders may require to respond to an incident in Areas 1 and 2.

8. Description of types of fire suppression measures.

The existing Bridgeton IMP already includes a description of fire suppression measures (Section 5.0 and Figure 3). The OU-1 Respondents propose to revise the existing Bridgeton IMP to identify any additional resources that would be necessary to respond to an incident in OU-1. Such revisions will be developed based on input to be provided by the first responders and other regulatory authorities, as necessary.

9. Description of personal protective equipment, including monitoring and sampling gear, to be used by landfill personnel.

Personal protective equipment is always required when performing work at the Bridgeton Landfill and West Lake Landfill. Technicians, specialists, managers, and third-party consultants/contractors at both OU-1 and OU-2 all receive Bridgeton's site contractor training prior to commencement of work, which includes an overview of personal protective equipment requirements. The OU-1 Respondents propose to revise the existing Bridgeton IMP to include a description of personal protective equipment that is required on a daily basis for work at the West Lake Landfill, as well as describe any additional personal protective equipment that would be necessary, including monitoring and sampling gear, to respond to an incident in OU-1 (making it clear, as necessary, which equipment is required for day-to-day activities, and which is specific to incident response, or unique to OU-1 work over and above what is required for any work at the Bridgeton Landfill). Any personnel that may enter into Areas 1 and 2 and who have not already received General Employee Radiation Training (GERT) will receive such training.

10. Description of measures to prevent off-site runoff of potentially contaminated fire suppression water.

The OU-1 Respondents propose to update the existing IMP to include a narrative description and map delineation of measures to prevent off-site runoff of potentially contaminated fire suppression water from OU-1. Development of measures to prevent site runoff of potentially contaminated fire suppression water from OU-1 will take into consideration the installation of the non-combustible cover over surface RIM in Areas 1 and 2, the results of the demonstration that the remaining vegetation does not pose a threat of release, and input from the first responders and other regulatory authorities (as necessary) regarding the methods (e.g., foam, water, or soil) that may be used to suppress a potential vegetation fire or other type of fire in Areas 1 and 2. In the event that water is used to suppress a fire, a procedure will be developed to temporarily block portions of the stormwater conveyance system along the perimeter of Areas 1 and 2 such that the perimeter ditch system may be used to collect and contain any fire suppression water runoff. Contractors to the OU-1 Respondents will then be able to subsequently transfer the collected water to one or more storage tanks used to contain equipment decontamination water and to collect samples for testing to determine the appropriate management and disposition for such water.

11. Description of planned response actions to advise local emergency officials on emergency actions to protect the on-Site workers and the community as well as to fully characterize the impacts of the incident, to include at a minimum:

- a. air monitoring and sampling,
- b. capture, characterization, and proper management of fire suppression waters; and
- c. characterization of potentially impacted soils.

The existing Bridgeton IMP already includes a list of planned response actions to advise local emergency officials on emergency actions to protect on-site workers and the community (Section 5.0). The OU-1 Respondents propose to revise the existing Bridgeton IMP to include specific response measures necessary to characterize the potential impacts of an incident, including air monitoring and sampling; the capture, characterization, and proper management of fire suppression waters; and the characterization of potentially impacted soils in the event of an incident occurring prior to the placement of the non-combustible cover or barrier in OU-1.

The OU-1 Respondents currently operate and routinely sample a network of 13 air monitoring stations at the site. The majority of these stations are located around the perimeters of Areas 1 and 2. A report of the results obtained during the first quarter of this air monitoring program was recently submitted to EPA. The OU-1 Respondents will review the scope of and results obtained from the existing air monitoring program relative to coverage of potential incidents (e.g., vegetation fire) in Areas 1 and 2 to assess whether the existing monitoring network and program provides adequate areal coverage, suitable sample collection methods, and other pertinent factors that would allow it to be used to provide coverage of a potential incident that may occur in OU-1.

The capture, characterization and management of potential fire suppression water, if any, were previously discussed above under item no. 10. Specifically, in the event that water is used to suppress a fire, a procedure will be developed to temporarily block portions of the stormwater conveyance system along the perimeter of Areas 1 and 2 such that the perimeter ditch system may be used to collect and contain any fire suppression water runoff. Contractors to the OU-1 Respondents will then be able to subsequently transfer the collected water to one or more storage tanks used to contain equipment decontamination water and to collect samples for testing to determine the appropriate management and disposition for such water.

Upon completion of all response activities for a given incident, a contractor to the OU-1 Respondents will inspect the area where that incident occurred to determine the need for and the scope of potential soil characterization, and, if determined to be appropriate, will collect soil samples for laboratory testing. A report of such inspection and sample collection, if any, will be prepared and submitted to EPA, MDNR, MDHSS, the St. Louis County Health Department, and the St. Louis County Emergency Management Office (EMO).

12. Description of response measures to be taken after a surface fire event, including any necessary surface soil stabilization measures.

The existing Bridgeton IMP already includes a description of response measures to be taken after severe incidents, including coordination of restoration and resumption activities with the appropriate agencies and the Incident Commander (Section 5.0). The OU-1 Respondents propose to revise the existing Bridgeton IMP to identify any additional response measures that would be necessary, including any necessary surface

soil stabilization measures, to respond to an incident in OU-1. Specifically, as part of the post-incident inspection of the incident area, contractor(s) to the OU-1 Respondents will assess the need for and scope of any soil stabilization measures that may be required. The OU-1 Respondents have existing mechanisms in place (via contract with Hunt Environmental Services) that can be used to conduct soil stabilization activities if such activities are determined to be necessary.

13. Description of after action reporting to be made to applicable federal, state, and local agencies.

The OU-1 Respondents will revise the existing Bridgeton IMP to include a description of after-action reporting to be made to applicable federal, state, and local agencies in the event of an incident in OU-1. Among other things, the OU-1 Respondents anticipate expanding the existing Bridgeton IMP to require that a report of the incident and the results of any post-incident inspection and sample collection and analysis activities will be prepared and submitted to EPA, MDNR, MDHSS, St. Louis County Health and St. Louis County EMO, and the first responders.

14. Description of methods and timing for training any and all potential emergency responders on requirements and implementation of this plan, as well as plans for exercise, reviews, and revisions of this plan. Any revised plans must be provided to EPA, MDNR, MDHSS, and local response agencies.

The existing Bridgeton IMP already includes a description of plans for reviews and revisions to the plan (Section 7.0). The OU-1 Respondents propose to revise the existing Bridgeton IMP to include a description of methods and timing for training potential emergency responders on requirements and implementation of the revised IMP (including any training specific to the modifications and additions for OU-1), as well as schedules for practice exercise and evaluation of the plan. Such training will be subject to the results of discussions with the first responders, but is anticipated to include GERT and OU-1 incident response training as appropriate.

15. Description of agreements in place with local, state, and federal first responders to implement the OU-1 IMP.

The existing Bridgeton IMP already includes a description of agreements in place with local, state, and federal first responders (Sections 5.0 and 6.0). The OU-1 Respondents propose to supplement the existing Bridgeton IMP to provide a description of any additional agreements in place with local, state, and federal first responders to implement the OU-1 IMP.

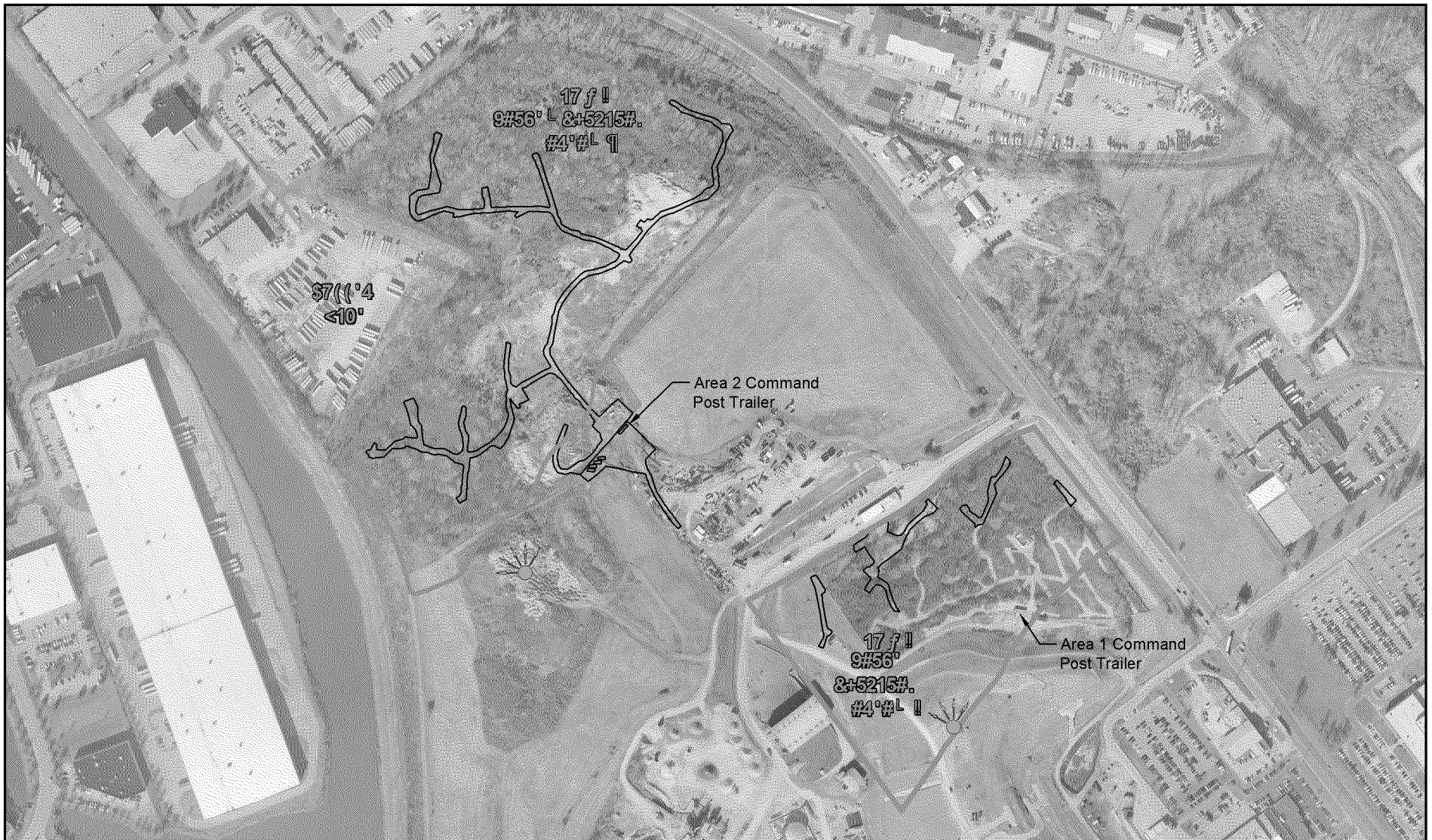
4. SCHEDULE

During the regularly scheduled quarterly meeting with the first responders held on December 17, 2016, Bridgeton Landfill informed the representatives of the first responders of the UAO requirements relative to an OU-1 IMP, scheduled an initial meeting for January 21, 2016 to

discuss the IMP with the first responders (which may be moved up, as noted below), and also discussed and agreed to resume monthly meetings with the first responders until such time that the OU-1 IMP is finalized.

Based on Bridgeton Landfill's initial discussions with the first responders and the discussions presented in Section 3 of this framework, the following schedule is currently anticipated for completion of the 15 IMP elements listed in the UAO:

- Expansion of the site observation/monitoring points and initiation of routine inspection of Areas 1 and 2 by Bridgeton Landfill personnel – on or before January 4, 2016;
- Initial meeting and inspection of Areas 1 and 2 with representatives of the first responders – January 14, 2016 (tentative date subject to first responders agreeing to change the date of the regularly and previously scheduled meeting from January 21, 2016 to January 14, 2016);
- Additional meetings with the first responders to take place every two weeks thereafter (subject to agreement by the first responders and subject to their availability relative to their other duties); and
- Preparation and submission of a draft revised IMP to EPA – February 29, 2016 (subject to change based on input from and requirements of the first responders).



LEGEND



Visual Inspection Station Location



Newly Constructed Road



SCALE IN FEET



Figure X

**Incident Management Plan
Visual Inspection Station Locations
West Lake Landfill Superfund Site**

EMS Engineering Management Support, Inc.